UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HELEEN MEES,

Plaintiff,

-against-

CITY OF NEW YORK, MANHATTAN DISTRICT ATTORNEY'S OFFICE, CYRUS VANCE, JR., NITIN SAVUR, JEANINE LAUNAY, SAMANTHA SCHOTT,

Defendants.

NOTICE OF JOINT MOTION TO DISMISS

19 Civ. 7346 (AJN)(KNF)

PLEASE TAKE NOTICE that upon the annexed Declaration of Assistant District Attorney Elizabeth N. Krasnow dated November 14, 2019, the exhibits listed therein, the accompanying memorandum of law, and all prior pleadings and proceedings herein, defendants City of New York, the New York County District Attorney's Office, District Attorney Cyrus R. Vance, Jr., and Assistant District Attorneys Nitin Savur, Jeanine Launay, and Samantha Schott will jointly move this Court before the Honorable Alison J. Nathan, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York, on a date to be determined by the Court, for an Order pursuant to Federal Rule of Civil Procedure 12(b)(1) and (b)(6) dismissing the complaint, with prejudice, as well as for any further relief the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that the briefing schedule endorsed by the Court on October 25, 2019, *see* ECF 17, requires that plaintiff file any opposition papers by January 10, 2020 and that defendants file any reply papers by January 24, 2019.

Dated: New York, New York
November 14, 2019

CYRUS R. VANCE, JR.
District Attorney of New York County
One Hogan Place
New York, New York 10013
(212) 335-9000
Counsel for the DA defendants

By: Elizabeth N. Krasnow /s
Elizabeth N. Krasnow
Assistant District Attorney

JAMES E. JOHNSON
Corporation Counsel of the City of New York
100 Church Street
New York, New York 10007
(212) 356-1000
Counsel for the defendant City of New York

By: Genevieve Nelson /s
Genevieve Nelson
Assistant Corporation Counsel